

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

RAYNE VALENTINE,

Plaintiff,

-v-

THE CITY OF NEW YORK, et al.,

Defendants.

**PLAINTIFF'S FIRST SET OF
REQUESTS FOR ADMISSIONS
TO THE INDIVIDUAL
DEFENDANTS**

Index No. 21-cv-04867 (EK)(VMS)

**PLAINTIFFS' FIRST SET OF REQUESTS FOR ADMISSIONS TO
DEFENDANTS**

Plaintiff incorporates by reference the "INSTRUCTIONS" and "DEFINITIONS" sections of Plaintiff's First Set of Interrogatories and Requests for Production of Documents dated December 20, 2022.

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure and the Local Civil Rules for the Eastern District of New York, Plaintiff, by his attorney, Gideon Orion Oliver, hereby demands that the Individual Defendants respond in writing and under oath, within thirty days after service hereof, to the following requests for admissions.

To the extent you object to a particular Request for Admission ("RFA") based on its styling as such, please respond to the same as if it were an interrogatory or other discovery demand.

THE REQUESTS FOR ADMISSIONS

1. Defendant was on duty working a shift as a NYPD member on May 31, 2020 when the events depicted in the First Valentine Video occurred.
2. Defendant was present near the intersection of Nostrand and Church Avenues in Brooklyn, New York on May 31, 2020.

3. Defendant was within 30 feet of Defendant Amjad Kasaji near the intersection of Nostrand and Church Avenues in Brooklyn, New York when the events depicted in the First Valentine Video occurred on May 31, 2020.

4. Defendant was within 30 feet of Defendant Dimitri Kalinin when he made an arrest near the intersection of Nostrand and Church Avenues in Brooklyn, New York shortly before the events depicted in the First Valentine Video occurred on May 31, 2020.

5. Defendant observed Rayne Valentine near the intersection of Nostrand and Church Avenues in Brooklyn, New York on May 31, 2020.

6. Defendant spoke with Rayne Valentine on May 31, 2020.

7. Defendant gave an order or command to Rayne Valentine on May 31, 2020.

8. Defendant physically touched Rayne Valentine on May 31, 2020.

9. Defendant used force on Rayne Valentine on May 31, 2020.

10. Defendant heard another NYPD member speak with Rayne Valentine on May 31, 2020.

11. Defendant heard another NYPD member give an order or command to Rayne Valentine on May 31, 2020.

12. Defendant observed another NYPD member touch Rayne Valentine on May 31, 2020.

13. Defendant observed another NYPD member use force on Rayne Valentine on May 31, 2020.

14. Defendant has Personal Knowledge related to a use of force against Rayne Valentine on May 31, 2020.

15. Defendant received information from another person regarding NYPD use of force on Rayne Valentine on May 31, 2020.

16. Defendant received information from another person regarding NYPD interactions with Rayne Valentine on May 31, 2020.

17. Defendant attempted to visit Rayne Valentine at Kings County Hospital on May 31, 2020.

18. Defendant visited Rayne Valentine at Kings County Hospital on May 31, 2020.

19. Defendant attempted to visit Rayne Valentine at his private residence on May 31, 2020.

20. Defendant visited Rayne Valentine at his private residence on May 31, 2020.

Dated: Brooklyn, NY
December 20, 2022

Very Truly Yours,

/S/

Gideon Orion Oliver
Counsel for Plaintiff
277 Broadway, Suite 1501
New York, New York 10007
718-783-3682